

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**In re.: KIM ZIEGELMAYER, Debtor**

**BK No.: 17-11357**

**Chapter 7**

**CHARLES A. PISATURO, JR.  
TRUSTEE**

**Plaintiff,**

**v.**

**AP No.:19-AP-01020**

**SUNFLOWER REAL ESTATE, LLC;  
KIM ZIEGELMAYER, AND LINDA  
L. GLYNN**

**Defendant.**

**ANSWER TO COMPLAINT IN ADVERSARY PROCEEDING**

The Defendant, Kim Ziegelmayr, hereby responds to the above referenced Adversary Proceeding as follows:

1. Defendant admits the allegations contained in Paragraphs 1, 2, 3, 4, 5, 6, 7, 11, 28, 30, 31, 32, 33, 37, 46, 48, 49, and 50 of the Plaintiff's Complaint.
2. Defendant neither admits nor denies the allegations contained in Paragraphs 8, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 29, 38, 39, 40, 41, 42, 43, and 47 of the Plaintiff's Complaint and leaves Plaintiff to his burden of proof.
3. Defendant is without sufficient information to either admit or deny the allegations contained in paragraphs 27, 34, 35, 36, 44, 45, 51, and 52 of the Plaintiff's Complaint and leaves said Plaintiff to his burden of proof;

**COUNT I**

**Declaratory Judgment, Turnover & Accounting  
(Debtor's Estate has an Equitable Interest in Sunflower)**

4. The allegations contained in paragraph 53 of Plaintiff's Complaint are such that no responsive pleading is required.
5. Defendant admits the allegations contained in Paragraphs 54 and 55 of Count I of Plaintiff's Complaint.

6. Defendant denies the allegations contained in Paragraphs 56, 57, 58, 59 and 60 of Count I of Plaintiff's Complaint.
7. Defendant neither admits nor denies the allegations contained in Paragraphs 61 and 63 of Count I of Plaintiff's Complaint.
8. Defendant is without sufficient information to either admit or deny the allegations contained in Paragraph 62 of Count I of the Plaintiff's Complaint and leaves said Plaintiff to his burden of proof;

**COUNT II**  
**(Against Defendant Glynn)**

9. The allegations referenced in Count II of Plaintiff's Complaint do not apply to Defendant, Kim Ziegelmayer, therefore no responsive pleading is required.

**WHEREFORE,** Defendant prays that the Plaintiffs Complaint be dismissed and denied.

**Kim Ziegelmayer,**  
**By her attorney**

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**CERTIFICATION OF SERVICE**

I hereby certify that on July 22, 2019 I electronically filed an Answer to Complaint with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically: Office of the U.S. Trustee, Peter J. Furness, Esq. and Charles A. Pisaturo, Jr., Esq.; and I hereby certify that I have mailed by United States Postal Service, postage pre-paid, the document and a copy of the Notice of Electronic Filing to the following non CM/ECF participants: NONE

/s/Christopher M. Lefebvre